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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

United States of America,

Plaintiff,

v.

Tarence L. Lard,

Defendant.

Case:4:21-cr-20149

Judge: Davis, Stephanie Dawkins

MJ: Ivy, Curtis

Filed: 03-03-2021 At 04:26 PM

USA v. TARENCE LARD (TT)

Violations:

18 U.S.C. § 924(c)(1)(A)

21 U.S.C. § 841(a)(1)

18 U.S.C. § 922(g)(1)

**F I L E D**  
**MAR 03 2021**

U.S. DISTRICT COURT  
FLINT, MICHIGAN

**INDICTMENT**

THE GRAND JURY CHARGES:

**COUNT ONE**

**18 U.S.C. § 924(c)(1)(A)**

**Possession of a firearm in furtherance of a drug trafficking crime**

1. On or about August 18, 2020, in the Eastern District of Michigan, defendant, Tarence Lard knowingly and unlawfully possessed a firearm, that is, a Glock, model 23, .40 caliber semiautomatic pistol, a Glock, model 19 Gen 4, 9mm semiautomatic pistol, and an Anderson Manufacturing, model AM-15, multi-caliber semiautomatic pistol, in furtherance of a drug trafficking crime, for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute cocaine as alleged in Count Two of this Indictment.

All in violation of 18 U.S.C. § 924(c)(1)(A).

**COUNT TWO**

**21 U.S.C. §§ 841(a)(1) & (b)(1)(B)(iii)**

**Possession with intent to distribute cocaine**

2. On or about August 18, 2020, in the Eastern District of Michigan, defendant, Tarence Lard, knowingly and unlawfully possessed with the intent to distribute 28 grams or more of a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

All in violation of 21 U.S.C. §§ 841(a) and (b)(1)(B)(iii).

**COUNT THREE**

**18 U.S.C. § 922(g)(1)**

**Felon in possession of a firearm**

3. On or about August 18, 2020, in the Eastern District of Michigan, defendant, Tarence Lard, after having been convicted of a crime punishable by a term of imprisonment exceeding one year, a felony offense, and knowing that he had been previously convicted of a crime punishable by a term of imprisonment exceeding one year, knowingly and unlawfully possessed, in and affecting interstate commerce, a firearm, that is, a Glock, model 23, .40 caliber semiautomatic pistol, a Glock, model 19 Gen 4, 9mm semiautomatic pistol, and an Anderson Manufacturing, model AM-15, multi-caliber semiautomatic pistol.

All in violation of 18 U.S.C. § 922(g)(1).

**FORFEITURE ALLEGATION**

4. Pursuant to Fed. R. Cr. P. 32.2(a), the government hereby provides notice to the defendant of its intention to seek forfeiture of all proceeds, direct or indirect, or property traceable thereto, all property that facilitated the commission of the violations alleged, or property traceable thereto, and all property involved in, or property traceable thereto, of the violations set for in this Indictment, including but not limited to a Glock, model 23, .40 caliber semiautomatic pistol, s/n 1EVG221US; a Glock, model 19 Gen 4, 9mm semiautomatic pistol, s/n BFUZ436; an Anderson Manufacturing, model AM-15, multi-caliber semiautomatic pistol, s/n 19238075; and ammunition.

5. Substitute Assets: If the property described above as being subject to forfeiture, as a result of any act or omission of defendant:

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third party;
- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property that cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c).

THIS IS A TRUE BILL

*s/GRAND JURY FOREPERSON*

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GRAND JURY FOREPERSON

SAIMA S. MOHSIN

Acting United States Attorney

ANTHONY VANCE

Chief, Branch Offices

*s/BLAINE LONGSWORTH*

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BLAINE LONGSWORTH

Assistant United States Attorney

Dated: 3-3-21